Last Mile Access Critical to Competitive Broadband Services

- TelePacific, the third largest carrier in California, relies on last mile access to offer competitive broadband services to its SMB, school, health care, and community anchor institution customers.
    - We are the only telecom provider with facilities-based network coverage for nearly all of California. Assets include 29 switches, 293 owned collocations, and more than 57,000 fiber miles.
    - We have our fiber to 108 LEC wire centers, to many data centers and to more than 200 commercial buildings.
    - TelePacific's 2012 survey of available on net buildings from 27 alternative providers in 30 wire centers found non-ILEC last mile access facilities available at only 12.5% of TelePacific's customer service addresses.
    - Recent survey of three sample wire centers shows fiber may be available to only about 20% of our 120,000 customer locations.

- Properly maintained copper plant can be used to bridge the divide between today's largely copper-based networks and the mainly-fiber networks of the future.
    - Where fiber is not available, TelePacific offers 10-100 Mbps broadband service using copper loops, DS1/DS3 loops, and DS1/DS3 special access services.
    - Ethernet over Copper ("EoC") can provide 10-100 Mbps with 2-48 copper pairs.
    - Ethernet over DS1 speeds of 10 Mbps.
    - Nearly one-half of Sept. 2014 1,200 installs were for EoC services with average bandwidth nearly 20 Mbps.
    - Nearly 60% of ALL pending orders are for Ethernet: 28% are third party Ethernet over fiber from 15 different providers and 31% are EoC.
    - Preserving competitors' access to copper permits CLECs to rely on copper just as ILECs continue to do.

- When copper is not maintained, customers are losers.
    - EoC has the potential to speed up broadband deployment by using existing plant and increase broadband adoption rates where price is the primary reason for lack of adoption.
    - Copper pairs with chronic troubles interrupt customers' ability to run their business—when service is down they are literally off the map.
    - When copper pairs are not maintained, they are not available—forcing TelePacific's customers to higher-priced special access alternatives.

Red Gate Software Inc. is a company that works in the Microsoft SQL arena. They have a VoIP 20M service via EoC with a Failover 2M Ethernet over Fixed Wireless. They are located in Old Town Pasadena, CA and have no fiber into their building.

From: Tom Curtis [mailto:tom.curtis@red-gate.com]
Sent: Thursday, November 06, 2014 2:17 PM
To: John Cummings
Subject: RE: Please Read This -- Urgent

Sorry John. I've been away at a tradeshow. We do have a pretty decent fiber option available to us that isn't that much more than our current solution. AT&T has really tried hard to get us on that recently. Of course, I'd imagine the rates on fiber could go up significantly if we don't have an EoC option.

Here is a testimonial.

We depend on Ethernet over Copper for affordable high-bandwidth solution. Fiber isn't immediately available in our area, and we've been told that we would have to foot the cost to have fiber brought into our building. This would be prohibitively expensive and would significantly impact our ability to run our business.

Hope this helps.

Harbor Brake and Automotive is an auto repair shop in San Pedro, CA. They recently upgraded from 3 Mbps to 6 Mbps to better meet their business needs for VoIP and internet access. There is no fiber into their location.

-----Original Message-----
From: Harbor Brake Office Staff [mailto:office@harborbrake.com]
Sent: Thursday, November 06, 2014 3:25 PM
To: Laura Kuster
Subject: testimonial

I'm very happy with the 6Mb EoC service. The bandwidth is always consistent and the voice and fax lines work great. The installation was quick and professional, and there were only 10 minutes of downtime during the switchover. The EoC service meets all of my telecommunication needs for my small business, and I would recommend it to other small business owners looking for a complete telecommunications solution.

-Evan Yankovich
Harbor Brake & Automotive Service

Ace Beverage Co.

401 SOUTH ANDERSON STREET • LOS ANGELES, CALIFORNIA 90033 • (323) 264-6000 • (818) 246-8881

November 5, 2014

Ms. Nancy Lubamersky
Vice President - Strategic Initiatives and Public Policy
TelePacific Communications
515 South Flower Street
47th Floor
Los Angeles, CA 90071

RE: FCC Notice of Proposed Rulemaking – Copper Telecom Infrastructure

Dear Ms. Lubamersky:

We recently learned about certain proposed changes in regulations that currently support the retention of copper telecom infrastructure. These changes, if implemented, would potentially have a significant negative impact on our business by disrupting our customer service capabilities and by adding unnecessary costs to our communications infrastructure.

For almost 60 years, Ace Beverage Co. has been distributing beverage products to a sizable portion of metro Los Angeles. We are based in Boyle Heights, a designated "Enterprise Zone", and we employ over 400 people, 90% of whom self-identify as a minority. We have been strong supporters of our community and the majority of our work force resides in our business territory. We deliver products and services to over 4,000 retailers from a distribution center that operates 24 hours a day, six to seven days a week. We have territory rights to promote and distribute products from major consumer brand suppliers, including Anheuser-Busch, Constellation Brands, and Monster.

Our business depends on telecom connectivity between our work teams of sales executives, delivery staff, and merchandising specialists. These teams coordinate customer orders, marketing initiatives, and delivery schedules throughout each day to ensure our suppliers' brands are competitively positioned, and that our retailers have full shelves of products for their customers. All order activity is aggregated in our business system and communicated continuously to our suppliers and customers to ensure efficient and accurate tracking of products and information. We rely heavily on the copper-based infrastructure to transmit this data as well as support voice communications between our staff, suppliers, and customers.

A key challenge we face in this area of Los Angeles is that there are few viable options for telecom infrastructure. There is no fiber network in place to connect to our facility, and the cost of using other technologies or processes would be excessive and restrictive. A major shift in the policy of supporting legacy copper infrastructure will negatively impact our current operations and our ability to grow. We would appreciate your strong voice in advocating detailed requirements from the FCC to protect the copper infrastructure our business and our employees rely upon, 24 hours a day.

Thank you for your support.

Sincerely,

Tracy A. Edwards
Chief Financial Officer

Orange County Bar Foundation
Success Story

Hosted PBX raises the bar for communications with this Southern California organization assisting at-risk youth.

They are women and men driven by a constant focus on the bottom line — but in this case, it's one that has far greater significance than the dollars and cents that populate balance sheets. Their currency is young lives — lives at high risk of jail, drug dependency and removal from the possibility of productive, healthy futures.

For more than thirty years, the Orange County Bar Foundation (OCBF) has woven itself into the fabric of Southern California through its work providing education, counseling and mentoring to at-risk youth and their families. Programs are carefully targeted to reach specific audiences. Among OCBF's initiatives are Shortstop, a unique juvenile crime diversion program, culturally appropriate health and education programs for Latinas at high risk for HIV, drugs and other problems and programs that help youths succeed in following higher education arcs with individual mentoring and internships in law firms.

Highlights

- **Challenges** Provide an alternative to an aging PBX system with no onsite support people
- **Solution** Hosted PBX
- **Benefits** No more trips to the alley outside their office to manually reset the old PBX box. New unified communications features such as voicemail delivered via email and personalized call logs.

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"I couldn't be happier. I'm not at all technical and I want to concentrate on the Foundation's work, not the infrastructure. The installation went completely smoothly, which is just what I wanted. "

Karen Ruan
Executive Director
OCBF

Central to all of these efforts is communication and connection, in both English and Spanish — but for the OCBF staff, the ability of their phone system to support that effort was becoming problematical.

The Challenge

"Our phone system was fifteen years old, paid for and had really low monthly charges," says OCBF Executive Director Karen Ruan, "but it was really beginning to show its age. The box running it was out in the alley and we'd have to go down the stairs, stand on a chair and have the service people talk us through resetting it far too many times."

Ruan's IT and telecom consultant had installed a 2MB Ethernet over Copper circuit with SmartVoice to carry the Foundation's IP and old POTS lines, but he'd been waiting for the perfect upgrade before recommending a replacement for the creaky PBX. Conversations went on for a year — until TelePacific's Hosted PBX system, running over a new EoC circuit with 3MB of bandwidth, provided just the right solution.

The Solution

"I couldn't be happier," Ruan says. "I'm not at all technical and I want to concentrate on the Foundation's work, not the infrastructure. The installation went completely smoothly, which is just what I wanted. The voice quality's great and we're just beginning to take advantage of all the things this new system can do for us, like voice messages to email and seeing missed calls. Our program people are on the phone all the time and this really is a huge step forward."

For Ruan, never having to worry about system maintenance or obsolescence was also a huge positive.

"Our system was like an old car — paid for and cheap when it worked, but getting harder and harder to keep running. Some of the newer technical people couldn't work on it, either, because it was so outdated. You get what you pay for — and I don't miss going down to the alley at all."

Snapshot

Access

- 3Mbps Ethernet over Copper circuit

Services

- Hosted PBX

Advantages

- No more premises PBX box resets
- No expensive maintenance or service contracts
- Future-proof, always current solutions
- Convenience of voicemails delivered to email
- Personalized call logs

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Cumming Construction
Success Story

Worldwide commercial construction firm is building for the future with its upgrade to the latest SIP and MPLS network technologies

The 250 professionals at Cumming are totally at home directing hugely complex, demanding construction projects where the slightest slip in schedule can have major costs. Given that those projects — ranging from hospitals to casinos to office buildings — span all 50 states and more than 25 countries around the world, that home is more often than not a hotel room.

"We're a consultancy that handles every facet of major programs from project and cost management to dispute resolution," says Chris Morgan, Cumming Systems Administrator. "As a result, I'm constantly looking for new solutions. With everything changing so quickly, there's always a way to become even cheaper, faster and more efficient."

Highlights

- **Challenge** Find a way to maximize precious bandwidth and rapidly adapt to changing business needs
- **Solution** SmartVoice's SIP dynamic bandwidth allocation carried over TelePacific's ①Net MPLS network
- **Benefits** Bandwidth allocated to voice and data adjusts automatically to optimize performance. Extension-to-extension calls stay on-net and don't run up long distance charges.

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"TelePacific gives me small company attention…even though they're not small today. One thing that's really nice is I've gotten to know TelePacific's techs over the years because there's so little turnover. I've built up a rapport with them and really like knowing who's coming through the door."

Chris Morgan
Systems Administrator
Cumming Construction

The Challenge

When the recession put a crimp in construction and made videoconferencing an increasingly attractive alternative to expensive plane trips and hotel charges, Morgan looked at his existing network to understand how best to accommodate it. What he found was an array of PRIs, T1s and bundled T1s that weren't being used efficiently and sat idle with unused bandwidth.

"I went to TelePacific and said, show me what you can do. This was right when ①Net's MPLS network and SmartVoice's dynamic bandwidth allocation were just rolling out. That gave us the best of both worlds, letting me allocate bandwidth between voice and data as needed."

The Solution

Cumming transferred all its sites to ①Net and SmartVoice, using fiber, Ethernet over Copper and T1 transport. Core services like payroll and email and voice all run over the MPLS network today and Morgan's able to change the way he prioritizes network traffic as his needs change. Today, for example, an improving economy has made videoconferencing less needed. Voice traffic that links Cumming locations across the country with the ability to make on-net extension-to-extension calls that don't run up long distance charges has moved to the forefront.

"TelePacific's growth during the years we've worked with them has let me grow with new technology like MPLS," Morgan says. "I've been pushing to always be out front, even though we're a small company and I'm one of three IT people. TelePacific gives me small company attention that lets me do that, even though they're not small today. One thing that's really nice is I've gotten to know TelePacific's techs over the years because there's so little turnover. I've built up a rapport with them and really like knowing who's coming through the door."

Snapshot

Access

- Combination of fiber, Ethernet over Copper and T1

Services

- SmartVoice SIP dynamic bandwidth allocation
- ①Net MPLS IP VPN

Advantages

- Can change the way the network prioritizes traffic as needs change
- Ability to make on-net extension-to-extension calls that don't run up long distance charges

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